

CROWN LAW FIRM  
Yan E. Shrayberman (State Bar #253971)  
5151 North Palm, Ste 100  
Fresno, California 93704  
Telephone: (559) 779-2315  
Email: YanEsq@me.com

Attorney for Defendant  
JONATHAN SOUVANNASANE

UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF CALIFORNIA

\*\*\*

UNITED STATES OF AMERICA

Plaintiff,

v.

JOSHYMAR ESTRADA

Defendant.

**Case: 1:22-CR-00149 JLT-SKO**

**STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS  
UNDER SPEEDY TRIAL ACT;  
ORDER**

DATE: December 2, 2024

TIME: 9:00 am

COURT: Hon. Jennifer L. Thurston

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and  
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter is currently set for sentencing on December 2, 2024 in this Court.
2. By this stipulation, defendant now moves to continue the sentencing until **February 3, 2025**, and to exclude time between **December 2, 2024**, and **February 3, 2025**.
3. The parties agree and stipulate, and request that the Court find the following:

- 1 a) Counsel for defendant desires additional time to discuss sentencing  
2 issues in this matter and the application of various enhancements to  
3 the sentencing.  
4 b) Counsel for defendant believes that failure to grant the above-requested  
5 continuance would deny him the reasonable time necessary for effective  
6 preparation, taking into account the exercise of due diligence.  
7 c) The government does not object to the continuance.  
8

9 IT IS SO STIPULATED.

10 Dated: November 18, 2024

11 PHILLIP A. TALBERT  
12 United States Attorney  
13 /S/ STEPHANIE STOKMAN  
14 STEPHANIE STOKMAN  
15 Assistant United States Attorney

16 Dated: November 18, 2024

17 /s/ YAN SHRAYBERMAN  
18 YAN SHRAYBERMAN  
19 Counsel for Defendant

20 **FINDINGS AND ORDER**

21 IT IS SO ORDERED.

22 Dated: November 19, 2024

23   
24 UNITED STATES DISTRICT JUDGE